

IN THE COURT OF APPEALS
THIRTEENTH DISTRICT OF TEXAS
CORPUS CHRISTI, TEXAS

EX PARTE

KRISEAN GIBSON

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FILED IN
13th COURT OF APPEALS
CORPUS CHRISTI/EDINBURG, TEXAS

10/28/2020 10:22:01 AM

KATHY S. MILLS
Clerk
DOCKET NO. 13-20-00287-CR
DOCKET NO. 13-20-00288-CR

APPELLANT'S SECOND AMENDED MOTION
FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF

TO THE HONORABLE COURT OF APPEALS:

Appellant, by and through his attorney of record, Jessica S. Freud, respectfully moves the Court to extend the time for filing Appellant's brief in this cause, and in support therefore would show this Court as follows:

I.

This is an appeal from denial of a pretrial writ of habeas corpus seeking personal bond (CR 5, 73). This Motion is amended to correct the title of the filing (Appellant is on his first extension, not second) and the previous error regarding an extension previously being granted. Since this is Appellant's first extension (not second), this Motion was amended to ask for an additional week (21 days instead of 14 days as originally requested).

II.

Appellant's brief was due on Monday, October 26, 2020. This is Appellant's *first* request for an extension.

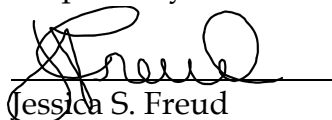
Counsel for Appellant needs an additional 21 days to finish Appellant's briefs. Within the past two weeks, counsel was appointed to handle a hyper-accelerated appeal arising out of Tex. Health & Safety Code 574.070 (*Albert Thatcher v. State*, 07-20-00230-CV), which has delayed the completion of the briefs in these causes.

Counsel has conferred with the State and certifies that the State represented it has no objection to this request.

III.

FOR THESE REASONS, Counsel for Appellant respectfully requests this Court grant this first request for extension of time to file Appellant's brief and set a due date of 21 days from October 26, the date Appellant's brief was due.

Respectfully submitted,



Jessica S. Freud
Freud Law P.C.
100 N. 6th Street, Suite 902
Waco, Texas 76701
Phone: (254) 307-3384
Fax: (254) 765-2739
State Bar No. 24095303
Email: Jessi@FreudLaw.com
Attorney for Appellant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this First Motion has been served on the District Attorney for McLennan County, Texas, on October 28, 2020, to Sterling.Harmon@co.mclennan.tx.us and/or Gabriel.Price@co.mclennan.tx.us.


Attorney for Appellant

Automated Certificate of eService

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JESSICA FREUD on behalf of Jessica Freud
Bar No. 24095303
JESSI@FREUDLAW.COM
Envelope ID: 47589551
Status as of 10/28/2020 11:31 AM CST

Associated Case Party: State of Texas

Name	BarNumber	Email	TimestampSubmitted	Status
Sterling SHarmon		sterling.harmon@co.mclennan.tx.us	10/28/2020 10:22:01 AM	SENT